

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of

DOCKET NO. 01-108 ORIGINAL

Year 2000 Biennial Regulatory Review –  
Amendment of Part 22 of the Commission's  
Rules to Modify or Eliminate Outdated Rules  
Affecting the Cellular Radiotelephone Service  
and other Commercial Mobile Radio Services

WT Docket No. 01-108

**Comments of CaseNewHolland Inc.**

**Summary of Comments**

CaseNewHolland Inc. (CNH), one of the largest heavy equipment manufacturers in the United States, has reviewed the proposed rule changes and is responding herein due to its significant concern over the potential negative impact on our industry of the proposed deletion of the Advance Mobile Phone Service (AMPS) analog cellular compatibility standard.

**Background and Discussion**

CNH is the number one manufacturer of agricultural tractors and combines in the world, the third largest maker of construction equipment, and has one of the industry's largest equipment finance operations. Revenues in 2000 were over \$10 billion. Based in the United States, CNH's network of dealers and distributors operates in over 160 countries. CNH agricultural products are sold principally under the Case IH, New Holland and Steyr brands. CNH construction equipment is sold principally under the Case, Fiatallis, Fiat-Hitachi, New Holland, and O&K brands.

For the last several years CNH has been developing a heavy equipment Fleet Management System (FMS) to support the asset management/productivity improvement needs of our dealers and customers. This FMS is comprised of Asset Monitoring Units (AMUs) installed in equipment, that gather position information from Global Positioning System satellites and other data from the

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equipment itself; a wireless communications link that handles the communication of data between the AMUs and a common Data Center; and the Data Center which stores, processes and shares the data with dealers and customers over the internet and World Wide Web. It is expected that such FMS systems will significantly improve both the utilization and maintenance of the expensive equipment assets of our customers.

Since the beginning of our development efforts, one of the primary system requirements has consistently been the need for wireless communications coverage where the majority of our customers use their equipment. Early in our studies, we determined that the AMPS footprint had a very good overlay with our coverage needs and that it was the only terrestrial based wireless communication system that came close to meeting our system geographic coverage requirements. CNH has recently launched an FMS service in the US, that is solely dependent on AMPS for its AMU to Data Center wireless communications link.

In Background paragraph 7 of the subject NPRM, the FCC states that from “the early 1980’s when the service was initiated . . . one of our earliest goals for the cellular service was that of nationwide technological compatibility of equipment, so that mobile telephone subscribers to a cellular system in one part of the country would be able to use their existing terminal equipment while “roaming” – i.e., using a different cellular system in another part of the country. To ensure technical uniformity . . . of cellular service, the Commission adopted detailed technical requirements for the provision of analog cellular service.” It was this early foresight and setting of standards by the FCC that lead to the development of a common nationwide analog cellular service (AMPS) with a ubiquitous geographic footprint of service availability.

In Europe, during the early 1980’s, there were no European cellular standards and multiple systems were developed in different countries. There too, this was recognized as a problem and a study group, the Group Special Mobile (GSM) was formed to develop a pan-European public land

mobile system. This responsibility was eventually transferred to the European Telecommunications Standards Institute (ETSI), and in 1990 phase 1 of the GSM specifications were published. GSM commercial services were launched in mid-1991 and pan-European cellular services developed in accordance with GSM standards. Once again, it was common standards requirements that led the cellular industry to develop services providing a broad ubiquitous geographic footprint, this time over much of Europe.

### **Comments on Proposed Rule Changes**

We agree with the FCC, that as stated in the NPRM, “Most of our existing rules for cellular services have now been in force for nearly two decades” and during that time, new technologies have been developed (and are continuing to be developed) allowing cellular service providers increased system capacity; with better quality and additional services. We also acknowledge that the competitive landscape has been expanded to include PCS and SMR providers. However, this proliferation of new technology development, without any common standards; has lead to multiple competing technologies, with different hardware platforms offering incompatible services. The common link to most cellular service offerings today is still multimode services, dependent on AMPS to fill out their national geographic footprint offerings. The motivation of the large competing carriers is also focused on population based coverage, not geographic coverage, because that is where they get customer expansion payback for their continuing investments.

Our concern in review of the NPRM is that the conclusions and recommendations seem to be based highly on cellular carrier perspectives and the hand held cellular phone market; without enough consideration being given to impact of changes on other types of new customers, applications and services that have evolved as a result of standardized systems and reasonably priced, ubiquitous geographic wireless service offerings. Automotive OEM services (such as OnStar, recognized in NPRM) and many of the Fleet Management Services now offered in the trucking and heavy

equipment industries (including our FleetLink system) are dependent on such geographic wireless coverage. The hardware basis of these services is also significantly different than for hand held cell phones. In the highly competitive hand held market, with costs of hardware dropping and new services being offered; it is relatively cheap and easy for customers to switch to a new phone with different technology on a short cycle. Not so for cellular systems built into vehicles, with life spans of 10+ years, that are an integrated part of larger Automotive Services or Fleet Management Systems. At the present time each of the major cellular carriers are working on new multi-mode technology services for vehicles; but with three different competing digital technologies, with different hardware, and carriers with different migration paths to the next generation; there is no clear long term winner at this point (except in Europe where the choice is standards based). An important part of any near term vehicle use of the new technology systems is multi-mode service availability where AMPS fills out the geographic footprint and is the back up service where primary digital service is not offered. If the AMPS compatibility requirement is removed from the cellular carriers before a replacement common technology standard evolves; it is clear that the service coverage for existing vehicle systems, that are not easily converted, will deteriorate as major carriers convert more capacity to new technologies. At a time when technology is generally offering industry new tools for increased productivity; this will be a set back offering our large and small business customers alike, unnecessary choices between degraded performance or high trade –up costs within their Fleet Management Systems.

We understand the need to implement new cellular phone technologies to allow for more efficient use of the bandwidth and to achieve lower service costs. However, so far history has shown that government imposed standards are the only way that we've been able to achieve common technology geographic ubiquitous coverage. As a minimum, our recommendations here are to delay elimination of the AMPS compatibility requirements to provide acceptable coverage for existing and

near term vehicle systems (not easily changed); and even then to have the time of it's elimination contingent on the cellular industry having implemented alternative technology service offerings with operational geographic coverage equivalent to that of AMPS. This puts the onus on the cellular industry to solve the standardization problem and to provide improved technology solutions across all MSAs and RSAs, to all customers; rather than just focusing on delivery of competing technologies to personal consumers in high population areas as they are now.

### **Summary of Recommendations**

Therefore, CNH recommends that the Commission delay elimination of the AMPS compatibility requirements for at least ten years after a new digital standard is operationally in place, in order to provide existing and near term vehicle systems with continued geographic coverage equivalent to that of AMPS today and to motivate the cellular industry to rapidly converge on such standardization for the benefit of all cellular users.

Respectfully submitted,

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